



Office for Human Research Protections
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May 31, 2002

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Ronald R. Peterson
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Michael Klag, M.D.
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**RE: Human Research Subject Protections Under Multiple Project Assurance
(MPA) M-1011**

**Research Publication: Ventilation with Lower Tidal Volumes as Compared with
Traditional Tidal Volumes for Acute Respiratory Distress
Syndrome. (N Engl J Med 2000; 342:1301-8)**

**Project Title: Prospective, Randomized, Multicenter Trial of 12 ml/kg
vs 6 ml/kg Tidal Volume Positive Pressure Ventilation
and Ketoconazole vs Placebo for the Treatment of Acute
Lung Injury and Acute Respiratory Distress Syndrome**

Principal Investigator: Roy Brower, M.D.
IRB Number: RPN 95-12-15-02
HHS Project Number: N01-HR46063

Dear Dr. Dang, Dr. Klag, and Mr. Peterson:

The Office for Human Research Protections (OHRP) has reviewed the Johns Hopkins University School of Medicine's (JHU's) May 23, 2002 report that was submitted in response to OHRP's February 4, 2002 letter regarding the above-referenced research.

Based upon its review, OHRP makes the following determinations regarding the above-referenced research:

(1) HHS regulations at 45 CFR 46.111(b) stipulate that in order to approve research, the IRB shall determine that when some or all of the subjects are likely to be vulnerable to coercion or undue influence, additional safeguards have been included in the study to protect the rights and welfare of the subjects. In its February 4, 2002 letter, OHRP expressed concern that the JHU IRB may have failed to ensure that this requirement was satisfied for the above-referenced research.

OHRP finds that JHU has adequately addressed this concern. Furthermore, OHRP acknowledges that JHU has implemented appropriate corrective actions under its MPA as part of its response to OHRP's letter of July 19, 2001 to ensure that additional safeguards are in place for research involving vulnerable populations.

(2) OHRP finds that JHU has adequately addressed the additional concerns raised in OHRP's February 4, 2002 letter.

As a result of the above determinations, there should be no need for further involvement of OHRP in this matter. Of course, OHRP must be notified should new information be identified which might alter this determination.

OHRP appreciates the continued commitment of your institution to the protection of human research subjects. Please do not hesitate to contact me should you have any questions.

Sincerely,

Patrick J. McNeilly, Ph.D.
Compliance Oversight Coordinator
Division of Compliance Oversight

cc: Dr. Martha Hill, Dean, School of Nursing, JHU
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